

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE**

RICHARD BRADDOCK,

Plaintiff,

vs.

ZAYCON FOODS, LLC, a Washington limited liability company; FRANK R. MARESCA, JANE DOE MARESCA and the marital community composed thereof; MICHAEL GIUNTA, JANE DOE GIUNTA and the marital community composed thereof; MIKE CONRAD, JANE DOE CONRAD and the marital community composed thereof; and ADAM KREMIN, JANE DOE KREMIN and the marital community composed thereof,

Defendants.

No. 2:16-cv-01756-TSZ

**JOINT STIPULATED MOTION TO  
DISMISS WITH PREJUDICE AND  
ORDER**

1 Plaintiff Richard Braddock and Defendants Adam Kremin, Jane Doe Kremin,<sup>1</sup> and the  
2 marital community composed thereof, have reached a settlement agreement between them.

3 Pursuant to Federal Rule of Civil Procedure 41(a), LCR 7(d)(1), and LCR 10(g), and in  
4 accordance with the settlement agreement, Plaintiff Richard Braddock (“Braddock”) and  
5 Defendants Adam Kremin, Amy Joy Kremin, and the marital community composed thereof  
6 (collectively, the “Kremins”), through their respective counsel, jointly move the Court for an order  
7 dismissing all claims asserted against one another with prejudice.

8 Specifically, Braddock moves to dismiss all of his claims against Defendants Adam Kremin,  
9 Amy Joy Kremin, and the marital community composed thereof, with prejudice. Adam Kremin  
10 moves to dismiss his counterclaims against Braddock with prejudice. Braddock and the Kremins  
11 further stipulate they shall each be responsible for their own attorneys’ fees, costs, and expenses.

12 For the avoidance of doubt, Braddock is not hereby dismissing, and does not hereby intend  
13 to compromise or otherwise affect, any of his claims against any Defendant other than Adam  
14 Kremin, Amy Joy Kremin, and the marital community composed thereof.

15 Respectfully, the parties move the Court for an order of dismissal consistent with this joint  
16 stipulated motion.

17 Respectfully submitted this 17th day of May, 2019.

18 By: s/ Sarah E. Elsden

19 Sarah E. Elsden, WSBA #51158  
20 Lee & Hayes, P.C.  
21 601 W. Riverside Ave., Ste. 1400  
22 Spokane, WA 99201  
23 Telephone: (509) 944-4682  
24 Fax: (509) 323-8979  
25 Email: Sarah.Elsden@leehayes.com

26 *Attorneys for Defendants Frank R. Maresca, Jane Doe*  
27 *Maresca, Mike Conrad, Jane Doe Conrad, Adam*  
28 *Kremin and Jane Doe Kremin*

---

1 The name of Adam Kremin’s wife at all times relevant to this action was and is Amy Joy Kremin. Therefore, the parties agree to substitute the name Amy Joy Kremin for Jane Doe Kremin in the Order of Dismissal.

1  
2 By s/ David L. Tift

3 David L. Tift, WSBA #13213  
4 Michael Jay Brown, WSBA #9224  
5 RYAN, SWANSON & CLEVELAND, PLLC  
6 1201 Third Avenue, Suite 3400  
7 Seattle, Washington 98101-3034  
8 Telephone: (206) 464-4224  
9 Facsimile: (206) 583-0359  
10 Email: brown@ryanlaw.com  
11 Email: tift@ryanlaw.com

12 David G. Trachtenberg, NYSB #1671023  
13 Leonard A. Rodes, NYSB #1927144  
14 Trachtenberg Rodes & Friedberg LLP  
15 545 Fifth Avenue, Suite 640  
16 New York, New York 10017  
17 Phone: 212-972-2929  
18 Fax: 212-972-7581  
19 Email: dtrachtenberg@trflaw.com

20 *Attorneys for Plaintiff Richard Braddock*

1 **ORDER OF DISMISSAL**

2 The Court, having reviewed the Joint Stipulated Motion to Dismiss With Prejudice, docket  
3 no. 157, being fully advised,

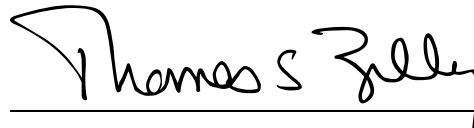
4 IT IS ORDERED THAT all claims of Plaintiff Richard Braddock against Defendants  
5 Adam Kremin, Amy Joy Kremin, and the marital community composed thereof are dismissed  
6 WITH PREJUDICE;

7 All counterclaims of Defendant Adam Kremin against Plaintiff Richard Braddock are  
8 dismissed WITH PREJUDICE;

9 No claims or counterclaims as between Braddock and any Defendant other than Adam  
10 Kremin, Amy Joy Kremin, and the marital community composed thereof, are hereby dismissed;  
11 and

12 All Parties to this Joint Stipulated Motion to Dismiss With Prejudice shall bear their own  
13 costs, expenses, and attorneys' fees.

14 DATED this 21st day of May, 2019.

15 

16  
17 Thomas S. Zilly  
18 United States District Judge

19 Presented by:

20 By s/ Sarah E. Elsden  
21 Sarah E. Elsden, WSBA #35969  
22 LEE & HAYES, P.C.  
23 601 W. Riverside Ave., Ste. 1400  
24 Spokane, WA 99201  
25 Telephone: (509) 944-4639  
26 Fax: (509) 323-8979  
27 Email: [Sarah.Elsden@leehayes.com](mailto:Sarah.Elsden@leehayes.com)

28 *Attorney for Defendants Frank R. Maresca,  
Jane Doe Maresca, Mike Conrad, Jane Doe Conrad,  
Adam Kremin and Amy Joy Kremin*

By s/ David L. Tift

David L. Tift, WSBA #13213

Michael Jay Brown, WSBA #9224

RYAN, SWANSON & CLEVELAND, PLLC

1201 Third Avenue, Suite 3400

Seattle, Washington 98101-3034

Telephone: (206) 464-4224

Facsimile: (206) 583-0359

brown@ryanlaw.com

tift@ryanlaw.com

David G. Trachtenberg, NYSB #1671023

Leonard A. Rodes, NYSB #1927144

Trachtenberg Rodes & Friedberg LLP

545 Fifth Avenue, Suite 640

New York, New York 10017

Phone: 212-972-2929

Fax: 212-972-7581

Email: dtrachtenberg@trflaw.com

Email: lrodes@trflaw.com

*Attorneys for Plaintiff Richard Braddock*